

AK Steel Corporation
Environmental Affairs
9227 Centre Pointe Drive
West Chester, Ohio 45069

October 15, 2015

Jeff Johnson, Chief
Kansas and Nebraska Remediation and Permitting Section
Waste Remediation and Permitting Branch
Air and Waste Management Division
United States Environmental Protection Agency - Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Re: HSWA Corrective Action Permit
Permit Number MOD 007 118 029
Quarterly Progress Report – Third Quarter 2015

Dear Mr. Johnson:



Pursuant to Section XIX - "Quarterly Progress Reports" of Part II of HSWA Corrective Action Permit Number MOD007118029, Permittee is to submit to the Environmental Protection Agency (EPA) and the Missouri Department of Natural Resources (MDNR) quarterly progress reports covering all activities conducted pursuant to the provisions of the Permit. This letter is intended to fulfill the requirements of that provision.

DESCRIPTION OF WORK COMPLETED

Interim Measures:

The *Interim Measures Work Plan for SWMUs 4, 7, and 33, and AOC 8* was submitted in July 2015. In a comment letter dated August 11, 2015 and received on August 17, 2015, EPA provided comments to the document. AK Steel provided response to comments in a letter dated September 17, 2015. A conference call with representatives from EPA, MDNR, AK Steel and Burns & McDonnell was scheduled for October 8 to discuss several aspects of the path forward for corrective action at the Facility.

RCRA Facility Investigation (RFI):

The *Interim Data Submittal for AOC 9, Boiler House, AK Steel – Kansas City, Missouri*, which provided for a surficial mercury cleanup in the former Boiler House with confirmation sampling, was submitted to EPA and MDNR on August 28, 2015. In a letter dated September 15, 2015 EPA approved the document as submitted.

Corrective Measures Study (CMS):

The *Corrective Measures Study Report Addendum for the Former Tank Farm* (SWMUs 6 and 24 and AOC 4) was submitted in July 2015. In a comment letter dated September 15, EPA provided comments to the document.

RCRA



547735

The *Revised Corrective Measures Study Report for the AMOCO Landfarm (SWMU 12)* was submitted to EPA and MDNR on August 28, 2015. In a letter dated September 15, 2015, EPA approved the document as submitted and requested development of an *Interim Measure Work Plan*.

SUMMARY OF FINDINGS AND LABORATORY DATA:

No findings or laboratory data were generated in the third quarter.

SUMMARY OF PROBLEMS AND POTENTIAL PROBLEMS:

A conference call with representatives from EPA, MDNR, AK Steel and Burns & McDonnell was scheduled for October 8 to discuss several aspects of the path forward for corrective action at the Facility.

PROJECTED WORK FOR THE NEXT REPORTING PERIOD:

Interim Measures:

Based on the outcome of discussions with EPA and MDNR regarding response to comments on the *Interim Measures Work Plan for SWMUs 4, 7, and 33, and AOC 8*, AK Steel anticipates development of a revised document in the fourth quarter of 2015.

Based on the timeline requested in the approval letter to the *Revised Corrective Measures Study Report for the AMOCO Landfarm (SWMU 12)*, development of an *Interim Measures Work Plan for SWMU 12* is anticipated in the fourth quarter of 2015.

RCRA Facility Investigation (RFI):

The approval letter for the *Interim Data Submittal for AOC 9, Boiler House* requested development of an Interim Measures Work Plan for the area. Since a minor surficial cleanup was outlined in the *Interim Data Submittal*, AK Steel anticipates discussion with EPA and MDNR regarding moving forward with those activities as currently presented.

Corrective Measures Study (CMS):

Response to comments to the *Corrective Measures Study Addendum for the Former Tank Farm* (SWMUs 6 and 24 and AOC 4) and development of a revised document are anticipated in the fourth quarter.

CERTIFICATION:

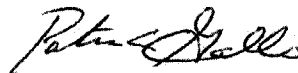
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are

Permit No. MOD 007 118 029
Third Quarter 2015 Progress Report
Page 3

significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

This Report and Certification are submitted on behalf of AK Steel Corporation.

Very truly yours,



Patrick Gallo
Senior Environmental Manager of Environmental Affairs

cc:

B. Morrison – EPA Region 7
C. Kump-Mitchell – St. Louis Regional Office – MDNR
J. El-Jayyousi - Hazardous Waste Program – MDNR
S. L. Shelton – Burns & McDonnell